

1 BRUCE D. MacLEOD (SBN: 130860)  
2 **DAVIS, BENGTON & YOUNG, APLC**  
3 1960 The Alameda, Suite 210  
4 San Jose, CA 95126  
5 Phone: 669.245.4200  
6 Fax: 408.985.1814  
7 Email: [bmacleod@dbj-law.com](mailto:bmacleod@dbj-law.com)

8 Attorneys for Defendants  
9 SAC ATTORNEYS, LLP, JAMES CAI,  
10 BRIAN BARNHORST and PATRICK  
11 O'SHAUGHNESSY  
12

13 UNITED STATES DISTRICT COURT  
14  
15 NORTHERN DISTRICT OF CALIFORNIA  
16

17 ABRAHAM ABITTAN, RACHEL  
18 ABITTAN, BRIAN ABITTAN, JACOB  
19 ABITTAN, ELENA ABITTAN, ROY  
20 GRABER and TOVA GRABER  
21

22 Plaintiffs,  
23

24 vs.  
25

26 HANSEN LAW FIRM, P.C., CRAIG  
27 HANSEN, STEPHEN HOLMES, SACT  
28 ATTORNEYS, LLP, JAMES CAI, BRIAN  
BARNHORST, PATRICK  
O'SHAUGHNESSY, YE & ASSOCIATES,  
PLLC, JINGJING YE and DOES 1-20,  
inclusive

Defendants.

Case No. 5:25-CV-5427

**REQUEST FOR JUDICIAL NOTICE IN  
SUPPORT OF DEFENDANTS' MOTION TO  
STRIKE OR DISMISS COMPLAINT  
PURSUANT TO FEDERAL RULE OF CIVIL  
PROCEDURE 12(b)(6) AND CALIFORNIA  
CODE OF CIVIL PROCEDURE §425.16  
[ANTI-SLAPP]**

Pursuant to Federal Rule of Evidence 201, Defendants SAC ATTORNEYS, LLP, JAMES CAI, BRIAN BARNHORST and PATRICK O'SHAUGHNESSY (hereinafter collectively "SAC Defendants") take judicial notice of the following documents and facts stated in those documents. Each document was filed with this court in the action titled *Yuting Chen v. Ariel Abittan, et al.*, United States District Court for the Northern District of California, Case No. 21-CV-0939 NC (hereinafter the "Underlying Action").

1. *Notice of Appearance of SAC Attorneys LLP on Behalf of Plaintiff Yuting Chen* filed in the Underlying Action as Document 62 on December 16, 2022 a true and correct copy of which is attached as Exhibit A to the *Declaration of Bruce D. MacLeod in Support of Defendants' Motion to Strike or Dismiss Complaint Pursuant to Federal Rule of Civil Procedure 12(b)(6) and California Code of Civil Procedure §425.16* (hereinafter "*MacLeod Declaration*").

2. *Order Dismissing Case with Conditions* filed in the Underlying Action as Document 92 on April 26, 2023, a true and correct copy of which is attached to the *MacLeod Declaration* as Exhibit B.

3. *Chen Declaration in Support of Opposition to Defendant's Motion for Fees and Costs, and Cross-Motions for Associated Fees and Costs* filed in the Underlying Action as part of Document 107 on May 26, 2023, a true and correct copy of which is attached to the *MacLeod Declaration* as Exhibit C.

4. *Judgment* filed in the Underlying Action as Document 114 on June 30, 2023, a true and correct copy of which is attached to the *MacLeod Declaration* as Exhibit D.

DATED: October 1, 2025

DAVIS, BENGTON & YOUNG, APLC

Bruce D. MacLeod  
Attorneys for Defendants  
SAC ATTORNEYS, LLP, JAMES CAI,  
BRIAN BARNHORST and PATRICK  
O'SHAUGHNESSY